

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GERARDO MOTA BAUTISTA, HUGO :
BAUTISTA, JUAN LUIS OVANDO :
ZEPEDA, JUAN ZEPEDA, JULIO :
RICARDO ALVAREZ MACATOMA, :
LEONCIO TORRES ACUNA, MARIO :
MORALES ROJAS, OMAR RODRIGUEZ, :
and ANTONIO LIMON HERNANDEZ :
individually and on behalf of others similarly :
situated, :

PLAINTIFFS, :

VS. :

CIVIL ACTION NO.: 19-CV-08808

COUNTY-WIDE MASONRY CORP., :
CARBEN INDUSTRIES, INC., CARBEN :
CONCRETE, INC., CARBEN :
CONSTRUCTION, INC., ANTHONY :
DERASMO, ANTHONY LOGIUDICE, :
RONALD BROWNING, and MARTIN DOE :
a/k/a PERU :

DECLARATION OF MATTHEW
LAKIND, ESQ.

DEFENDANTS. :

CARBEN INDUSTRIES, INC. :

THIRD PARTY PLAINTIFF, :

VS. :

BATRUME INDUSTRIES, INC. and :
COUNTY-WIDE CONSTRUCTION CORP., :

THIRD PARTY DEFENDANTS. :

I, Matthew Lakind, Esq., pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the foregoing is true and correct:

1. I am an associate at Tesser & Cohen, counsel for Carben Industries, Inc., Carben Concrete, Inc., Carben Construction, Inc., Anthony LoGiudice, and Ronald Browning (the “Carben Defendants”).

2. I submit this declaration in support of the Carben Defendants’ motion for summary judgment.

3. All exhibits attached to the Carben Defendants’ previously filed Statements of Material Facts and referenced in the Carben Defendants’ motion for summary judgment are true and accurate copies of those exhibits.

Dated: September 8, 2022



Matthew Lakind, Esq.